

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ZHAO LIU,)	Case No.: 1:21-cv-01091
)	Judge Edmond E. Chang
Plaintiff,)	Magistrate Judge Jeffrey T. Gilbert
v.)	
THE UNINCORPORATED ASSOCIATION)	
ON SCHEDULE "A",)	
Defendant.)	
)	

DISCOVERY PROGRESS REPORT

Plaintiff and Defendants (the “Parties”), through their counsels, hereby submit the discovery progress report to the Court as follows:

1. Pursuant to Federal Rules of Civil Procedure Rule 26(a)(1) and the Court’s discovery schedule entered on May 6, 2021 the Parties had made voluntary disclosures on May 27, 2021 and issued written discovery requests on June 14, 2021.

Plaintiff

2. Plaintiff’s written requests include production of documents, interrogatories, and requests for admission. Defendants’ written requests consist of production of documents and interrogatories.

3. Plaintiff has not received any documents or answers requested from Defendants as of today.

4. Plaintiff has prepared answers to Defendants’ interrogatories and collected documents requested by Defendants. Plaintiff plans to provide these information and documents to Defendants next week.

5. Defendants sent three deposition requests to Plaintiff on June 4, 2021 and asked for depositions to be conducted from June 21 to June 23, 2021. Because the written discovery requests were not issued at the time and there were schedule conflicts, Plaintiff declined the deposition requests on the dates and times proposed by Defendants. Plaintiff has informed Defendants that Plaintiff would like to discuss the deposition schedule with Defendants and have them arranged on another date.

Defendants

6. On June 4, 2021, Defendants served Notice of Deposition to Plaintiff for depositions to be conducted from June 21 to June 23, 2021. However, Plaintiff contends that the requested deposition should be conducted after [written discovery] stage of the discovery. Defendants disagree. The parties will meet and confer regarding the dates for depositions.

7. On June 14, 2021, Defendants served their First Set of Interrogatories and First Set of Request for Production.

8. Defendants have not received any documents or answers requested from Plaintiff as of today.

9. On June 14, 2021, Plaintiff served Defendants with its Request for Production of Documents, Request of Interrogatories and Request for Admissions.

10. Defendants plan to serve their responses to Plaintiff's June 14, 2021 Requests by July 14, 2021.

Respectfully submitted,

Dated on July 2, 2021.

By: /s/Jingfeng Song
Jingfeng Song
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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system of the U.S. District Court Northern District of Illinois, which sent notification of such filing electronically to counsel of record and the foregoing is available for viewing and downloading via the Court's ECF.

/s/Jingfeng Song
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